

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of Section 621(a)(1) of the)	MB Docket No. 05-311
Cable Communications Policy Act of 1984 as)	
Amended by the Cable Television Consumer)	
Protection and Competition Act of 1992)	

COMMENTS OF JACOB KAMHIS – WRITER / PRODUCER

November 16, 2018

To the Honorable Chair Ajit V. Pai:

I am a resident of Honolulu and currently engaged in writing screenplays for movies and producing shows for television. Although now a senior, I have worked in publishing for more than 30 years as a writer for magazines, senior reporter for a local newspaper and as a publications editor for a global technology company. Following a massive layoff by the technology company that employed me, I was unable to find work during the Great Recession. That is, until I found my way into a new career because of services and opportunities offered by Olelo Community Media (Olelo).

In addition, I am highly concerned about the possibility that Olelo and similar designated operators across our nation will be forced to impair, reduce or eliminate the servicing of their respective local communities due to the FCC's Second Further Notice of Proposed Rulemaking in the above referenced docket. At a time when news outlets, search engines and social media are attempting to control speech, I believe it is our duty to support community organizations that keep speech free.

Moreover, I strongly oppose the Commission's vague proposed definition of cable-related, in kind contributions as well as the possibility of destructive changes to items related to the franchise fee cap under the Cable Act that could lead to the insolvency of a designated operator such as Olelo.

SCOPE OF THE ISSUE AND OPTIONS

I am well aware that cable companies need revenue to maintain their services and expand distribution. While cable companies expand, however, why is it that organizations such as Olelo must continuously struggle to survive? Something must

be done at the federal level to fully address this matter so it no longer threatens the viability of Olelo and similar community organizations across the country.

At this time, cable companies and utilities use the public thoroughfares for their cables and poles and often times do not cull their old, unused lines – they just add new cables. Some of our streets, despite our beautiful tropical background, are a mess because the value of our thoroughfares has been overlooked.

If you, as a homeowner, wanted to gauge the value of your home, would you accept an appraisal of what your home was worth 34 years ago? This is the valuation of public thoroughfares that local citizens must accept in relation to the fee cap. Why hasn't an up-to-date appraisal of the public thoroughfares been performed in more than three decades to illustrate their current value in the 21st Century? It could make the issue at hand more fair.

I believe other options should be entertained and assessed. For instance, new federal legislation could allow the cable companies to tax deduct a portion of fees paid to designated operators. If organizations such as Olelo are 501(c)(3), then why can't they (and cable companies) receive the same treatment, as do churches or other supportive community groups that have the same standing?

The current proposed rules present a potential detriment to organizations like Olelo and will most certainly bypass the needs and interests of the local community. They deny the greatest possible diversity of information and resources to island residents and do not ensure that cable companies will continue to address the current and future needs of the local community.

Thank you for the opportunity to express my views.

Sincerely,

Jacob Kamhis